

## Epson America Comments on: ENERGY STAR® Program Requirements for Imaging Equipment V. 1.1 Draft 2

We would like to propose the following revision:

- Keep standby power criterion at 4.6W (No change from Draft 2.)
- Change the coefficient of the PSOR Functional Adder 0.05 (Version 1, Tier 1 value.)
- Institute an upper limit of PSOR Functional Adder of 6.4W (Standby power criterion (4.6W) + Total PSOR Functional Adder  $\leq 10W$  (Draft 1 value))

Reason for the proposal

- Impact printers must physically move pins during the printing process.
- Impact printers' print heads are larger and heavier than those in ink jet printers.
- Typically, impact printers consume more electricity than ink jet printers.

Because of this, impact printers require a larger power supply than ink jet printers. As shown in the chart standby power consumption is related to PSOR. (See chart below)

Based on our existing products, the PSOR adder should be .07. However, we suggest maintaining the coefficient from the current standard (.05) while adding an upper limit cap of 10 Watts.

Relationship between PSOR and standby power consumption of Impact printers

